

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

PAMELA WELLS,

Plaintiff,

v

Hon. Paul L. Maloney  
Magistrate Judge Ellen Carmody  
Case No. 1:07-cv-01214

CORPORATE RECEIVABLES, INC., and  
ANGELA GALVAN,

Defendants.

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**MOTION TO WITHDRAW AS COUNSEL FOR ANGELA GALVAN**

NOW COME the above-named Petitioners, Matthew I. Henzi and Sullivan, Ward, Asher & Patton, P.C. ("Petitioners"), and for their Motion to Withdraw as Counsel for Angela Galvan, state as follows:

1. On April 7, 2009, Petitioners filed an appearance to serve as counsel for both Defendants. (Docket #92).

2. Petitioners entered this litigation as counsel for Defendants shortly before case evaluation occurred and nearly 18 months after the Complaint was filed.

3. Petitioners replaced prior counsel, which was granted permission to withdraw as counsel for both Defendants on January 23, 2009 (Docket #80). Upon information and belief, Ms. Galvan participated in the defense of this action by communicating with prior counsel.

4. Petitioner Matthew I. Henzi has sent letters to Defendant Galvan, discussing this lawsuit and requesting that she contact him. To date, Ms. Galvan has never responded to these letters.

5. Petitioner Henzi sent these letters to Ms. Galvan's last known address in McAllen, Texas. Petitioners never received a "return to sender" notice or other postal notification that the address Petitioners used is not the address for Ms. Galvan.

6. Petitioner Henzi obtained a last known email address for Ms. Galvan. Petitioner Henzi sent correspondence to this address. No response has been received and no "return to sender" notification was received.

7. Petitioners do not have a valid telephone number for Ms. Galvan, despite attempts to locate one.

8. Petitioners cannot represent a Defendant with whom they cannot communicate.

9. Due to the inability to communicate with Ms. Galvan, there has been a material breakdown in the relationship between Ms. Galvan and Petitioners.

10. Petitioners served a copy of this motion on Ms. Galvan by sending it, via 1<sup>st</sup> class mail, to her last known address.

Wherefore, Petitioners respectfully request that this Honorable court grant their motion to withdraw as counsel for Angela Galvan and enter an order that Angela Galvan shall proceed in pro per in this litigation.

Respectfully submitted,

**SULLIVAN, WARD,  
ASHER & PATTON, P.C.**

s/ Matthew I. Henzi  
Sullivan, Ward, Asher & Patton, P.C.  
1000 Maccabees Center  
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Dated: May 18, 2009  
W0760683

**BRIEF IN SUPPORT OF  
MOTION TO WITHDRAW AS COUNSEL FOR ANGELA GALVAN**

Petitioners cite and rely on the statements and allegations made in the attached motion to withdraw as counsel for Angela Galvan in support of same.

**CERTIFICATE OF SERVICE**

I hereby certify that on May 18, 2009, my assistant, Tonya Green, electronically filed the Petitioners' Motion to Withdraw as Counsel for Angela Galvan and Brief in Support with the Clerk of the Court using the ECF system, which will send notification of such filing to Ian B. Lyngklip at *ianlyngklip@att.net*.

I also hereby certify that on May 15, 2009, my assistant, Tonya Green, served Petitioners' Motion to Withdraw as Counsel for Angela Galvan and Brief in Support and this Certificate of Service by placing same in an envelope addressed to:

**Ms. Angela Galvan  
7017 N. 15<sup>th</sup> Street  
McAllen, TX 78504**

and depositing the said envelope in the United States mail, postage thereon fully prepaid.

s/ Matthew I. Henzi  
Sullivan, Ward, Asher & Patton, P.C.  
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